



Virginia  
Regulatory  
Town Hall

## Proposed Regulation Agency Background Document

<b>Agency Name:</b>	Board of Veterinary Medicine/Department of Health Professions
<b>VAC Chapter Number:</b>	18 VAC 150-20-10 et seq.
<b>Regulation Title:</b>	Regulations Governing the Practice of Veterinary Medicine
<b>Action Title:</b>	Regulatory review
<b>Date:</b>	04/04/02

This information is required pursuant to the Administrative Process Act (§ 9-6.14:9.1 *et seq.* of the *Code of Virginia*), Executive Order Twenty-Five (98), Executive Order Fifty-Eight (99), and the *Virginia Register Form, Style and Procedure Manual*. Please refer to these sources for more information and other materials required to be submitted in the regulatory review package.

### Summary

*Please provide a brief summary of the proposed new regulation, proposed amendments to an existing regulation, or the regulation proposed to be repealed. There is no need to state each provision or amendment or restate the purpose and intent of the regulation; instead give a summary of the regulatory action and alert the reader to all substantive matters or changes. If applicable, generally describe the existing regulation.*

The Board of Veterinary Medicine is proposing amendments to 18 VAC 150-20-10 et seq. to address issues that have arisen during the periodic review of regulations, to update facility requirements, and to clarify certain provisions that have been confusing or problematic to licensees, especially related to the appropriate delegation of veterinary tasks to licensed technicians or unlicensed assistants.

### Basis

*Please identify the state and/or federal source of legal authority to promulgate the regulation. The discussion of this statutory authority should: 1) describe its scope and the extent to which it is mandatory or discretionary; and 2) include a brief statement relating the content of the statutory authority to the specific regulation. In addition, where applicable, please describe the extent to which proposed changes exceed federal minimum requirements. Full citations of legal authority and, if available, web site*

addresses for locating the text of the cited authority must be provided. Please state that the Office of the Attorney General has certified that the agency has the statutory authority to promulgate the proposed regulation and that it comports with applicable state and/or federal law.

**Chapter 24** establishes the general powers and duties of health regulatory boards including the responsibility to promulgate regulations, levy fees, administer a licensure and renewal program, and discipline regulated professionals.

*§ 54.1-2400. General powers and duties of health regulatory boards.--The general powers and duties of health regulatory boards shall be:*

- 1. To establish the qualifications for registration, certification or licensure in accordance with the applicable law which are necessary to ensure competence and integrity to engage in the regulated professions.*
- 2. To examine or cause to be examined applicants for certification or licensure. Unless otherwise required by law, examinations shall be administered in writing or shall be a demonstration of manual skills.*
- 3. To register, certify or license qualified applicants as practitioners of the particular profession or professions regulated by such board.*
- 4. To establish schedules for renewals of registration, certification and licensure.*
- 5. To levy and collect fees for application processing, examination, registration, certification or licensure and renewal that are sufficient to cover all expenses for the administration and operation of the Department of Health Professions, the Board of Health Professions and the health regulatory boards.*
- 6. To promulgate regulations in accordance with the Administrative Process Act (§ 9-6.14:1 et seq.) which are reasonable and necessary to administer effectively the regulatory system. Such regulations shall not conflict with the purposes and intent of this chapter or of Chapter 1 and Chapter 25 of this title.*
- 7. To revoke, suspend, restrict, or refuse to issue or renew a registration, certificate or license which such board has authority to issue for causes enumerated in applicable law and regulations.*
- 8. To appoint designees from their membership or immediate staff to coordinate with the Intervention Program Committee and to implement, as is necessary, the provisions of Chapter 25.1 (§ 54.1-2515 et seq.) of this title. Each health regulatory board shall appoint one such designee.*
- 9. To take appropriate disciplinary action for violations of applicable law and regulations.*
- 10. To appoint a special conference committee, composed of not less than two members of a health regulatory board, to act in accordance with § 9-6.14:11 upon receipt of information that a practitioner of the appropriate board may be subject to disciplinary action. The special conference committee may (i) exonerate the practitioner; (ii) reinstate the practitioner; (iii)*

*place the practitioner on probation with such terms as it may deem appropriate; (iv) reprimand the practitioner; (v) modify a previous order; and (vi) impose a monetary penalty pursuant to § 54.1-2401. The order of the special conference committee shall become final thirty days after service of the order unless a written request to the board for a hearing is received within such time. If service of the decision to a party is accomplished by mail, three days shall be added to the thirty-day period. Upon receiving a timely written request for a hearing, the board or a panel of the board shall then proceed with a hearing as provided in § 9-6.14:12, and the action of the committee shall be vacated. This subdivision shall not be construed to affect the authority or procedures of the Boards of Medicine and Nursing pursuant to §§ 54.1-2919 and 54.1-3010.*

11. *To convene, at their discretion, a panel consisting of at least five board members or, if a quorum of the board is less than five members, consisting of a quorum of the members to conduct formal proceedings pursuant to § 9-6.14:12, decide the case, and issue a final agency case decision. Any decision rendered by majority vote of such panel shall have the same effect as if made by the full board and shall be subject to court review in accordance with the Administrative Process Act. No member who participates in an informal proceeding conducted in accordance with § 9-6.14:11 shall serve on a panel conducting formal proceedings pursuant to § 9-6.14:12 to consider the same matter.*
12. *To issue inactive licenses and certificates and promulgate regulations to carry out such purpose. Such regulations shall include, but not be limited to, the qualifications, renewal fees, and conditions for reactivation of such licenses or certificates.*

The statutory authority for licensure and regulation of veterinarians, veterinary technicians and veterinary practices is found in Chapter 38 of Title 54.1 of the Code of Virginia:

<http://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+TOC540100000380000000000000>

## Purpose

*Please provide a statement explaining the need for the new or amended regulation. This statement must include the rationale or justification of the proposed regulatory action and detail the specific reasons it is essential to protect the health, safety or welfare of citizens. A statement of a general nature is not acceptable, particular rationales must be explicitly discussed. Please include a discussion of the goals of the proposal and the problems the proposal is intended to solve.*

The purpose of the amended regulation is to clarify certain provisions as follows:

- Amendments related to the terminology of animal facilities, veterinary facilities, animal hospitals, or veterinary practices were added to clarify that each establishment is responsible for registering with the Board. For the health, safety and welfare of the animals and their owners, each establishment must be accountable to the Board.
- The amendment to change the renewal cycle to a calendar year is intended to provide a logical time for expiration of a license rather than an arbitrary date of March 1<sup>st</sup>. It is believed that renewal compliance may improve and late fees may be avoided.

- Amendments to further specify and clarify the duties of the veterinarian-in-charge were adopted to address questions about whether the VIC is always required to practice on-site and concerns about notification to the Board if the VIC leaves the practice and discontinues serving in that role. The purpose is to ensure that there is someone responsible and accountable to the Board for the establishment and for the stock of controlled substances on premises without unduly burdening either the veterinarian or the practice if the discontinuation of the VIC is unexpected or on short notice.
- Amendments are adopted that will set the parameters for delegation of certain tasks by a licensed veterinarian to unlicensed assistants. Those tasks that may be delegated are those that do not require independent judgment and discretion; they are tasks that may be taught on the job and do not require a formal education. Patients are protected by requirements for the veterinarian to remain responsible for any tasks delegated to an unlicensed person.

## Substance

*Please identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. Please note that a more detailed discussion is required under the statement providing detail of the regulatory action's changes.*

Amendments to regulations will revise certain requirements to address certain issues and the need for clarification of some provisions identified during a periodic review of regulations. Amendments will clarify that the Board registers the veterinary establishment and will further specify the duties and responsibilities of the veterinarian in charge of each practice. To provide guidance for standards of practice, the Board will also set in regulation the delegation of duties to a veterinary technician or unlicensed veterinary personnel.

## Issues

*Please provide a statement identifying the issues associated with the proposed regulatory action. The term "issues" means: 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions; 2) the primary advantages and disadvantages to the agency or the Commonwealth; and 3) other pertinent matters of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, please include a sentence to that effect.*

The primary advantages to the public of implementing the amended regulations are as follows: a. By determining that dental extractions and closures do not constitute surgery and may be performed by a veterinary technician, the veterinarian may delegate those duties and spend more time on seeing patients and making diagnoses; b. By specifying in regulations the expanded tasks that may be delegated to veterinary assistants, the veterinarian may train additional staff to provide care to animals in his practice. While it could be argued that the treatment and care being delivered by a technician or an assistant rather than by a veterinarian is not the optimum for patients, the availability of persons to deliver that treatment and the access to veterinary care may be enhanced by changes to regulations. Given that veterinarians remain

wholly responsible for the animals in their care and for the actions of unlicensed persons in their employ, the public is reasonably protected.

There are no specific disadvantages to the public. As stated above, some consumers of veterinary services are critical of an expansion of the duties for technicians and assistants. In testimony before the Board, many expressed their concern about a diminution in the quality of care, but others, including veterinarians testified that the delegation of tasks to trained assistants was no different from the practice of human medicine.

There are no advantages or disadvantages to the agency; the amended regulation does not impose a new responsibility on the Board and does not involve additional cost or staff time.

## Fiscal Impact

*Please identify the anticipated fiscal impacts and at a minimum include: (a) the projected cost to the state to implement and enforce the proposed regulation, including (i) fund source / fund detail, (ii) budget activity with a cross-reference to program and subprogram, and (iii) a delineation of one-time versus on-going expenditures; (b) the projected cost of the regulation on localities; (c) a description of the individuals, businesses or other entities that are likely to be affected by the regulation; (d) the agency's best estimate of the number of such entities that will be affected; and e) the projected cost of the regulation for affected individuals, businesses, or other entities.*

### **Projected cost to the state to implement and enforce:**

(i) Fund source: As a special fund agency, the Board must generate sufficient revenue to cover its expenditures from non-general funds, specifically the renewal and application fees it charges to practitioners for necessary functions of regulation.

(ii) Budget activity by program or subprogram: There is no change required in the budget of the Commonwealth as a result of this program.

(iii) One-time versus ongoing expenditures: The agency will incur some one-time costs (less than \$1,000) for mailings to the Public Participation Guidelines mailing lists, conducting a public hearing, and sending copies of final regulations to regulated entities. Every effort will be made to incorporate those into anticipated mailings and Board meetings already scheduled.

### **Projected cost on localities:**

There are no projected costs to localities.

### **Description of entities that are likely to be affected by regulation:**

The entities that are likely to be affected by these regulations would be licensed veterinarians, licensed veterinary technicians and registered veterinary establishments.

### **Estimate of number of entities to be affected:**

Full Service Veterinary Facility: **596**  
Restricted Veterinary Facility: **160** (in-state) **5**(out-of-state) - Restricted total: **165**  
**TOTAL Facilities: 761**

Veterinarian - Active **1,764** (in-state) **309** (out-of state) - Active Veterinarian total: **2,073**  
Veterinarian - Inactive **65** (in-state) **593** (out-of state) - Inactive Veterinarian total: **658**  
**TOTAL Veterinarians: 2,731**

LVTs - Active **635** (in-state) **110** (out-of-state) - Active LVT total: **745**  
LVTs - Inactive (all in-state) **3**  
**TOTAL LVTs: 748**

**TOTAL REGULANTS FOR THE BOARD OF VETERINARY MEDICINE: 4,240**

There are 458 regulants who held a current license last year have not renewed

Full Service Facility 28  
Restricted Facility 30  
Veterinarian 323  
LVT 77

Based on past history, it is anticipated that 90% of these will renew late or have to go through reinstatement.

**Projected costs to the affected entities:**

There are no projected costs to the affected entities. The change from registration of an animal facility to a veterinary establishment should not require anyone to acquire an additional permit, because the Board has already been advising entities that a separate permit with a veterinarian in charge should be obtained for each practice in which a stock of drugs is maintained.

The change in the renewal schedule should not result in additional cost. If the renewal cycle is less than one year, the Board will likely prorate the fee for the time from March to January for that one time.

## Detail of Changes

*Please detail any changes, other than strictly editorial changes, that are being proposed. Please detail new substantive provisions, all substantive changes to existing sections, or both where appropriate. This statement should provide a section-by-section description - or cross-walk - of changes implemented by the proposed regulatory action. Where applicable, include citations to the specific sections of an existing regulation being amended and explain the consequences of the proposed changes.*

**18 VAC 150-20-10. Definitions.**

- Replace the definition of animal facility with a definition of veterinary establishment for consistency with the authority to register “establishments and premises” found in § 54.1-3804 of the Code of Virginia. Throughout the regulation, the term “animal facility” is replaced with the term “veterinary establishment.”
- Amend definition of veterinarian-in-charge to clarify that his responsibilities extend to overseeing compliance with federal and state laws and regulations.
- Revise the definition of surgery to clarify that certain acts do not constitute the practice of surgery and may be delegated to veterinary technicians under direct orders from a veterinarian.

**18 VAC 150-20-70. Licensure renewal requirements.**

- Revise the schedule of renewal to a calendar year (January 1) rather than the arbitrary date of March 1.
- Eliminate the requirement that continuing education documentation be maintained at the location where the original license is posted and specify that a periodic audit may be conducted to determine compliance. Licensees selected for an audit will be required to provide documentation of CE within 10 days of receiving notification from the Board.

**18 VAC 150-20-75. Expired license; reinstatement; practice with an expired or lapsed license not permitted.**

- Amend rule to be more specific about the documentation of clinical competency required for reinstatement to include hours of continuing education and other evidence of clinical practice or competency to practice.

**18 VAC 150-20-110. Requirements for licensure by examination as a veterinarian.**

- Amend the rule on recognition of foreign veterinary education to include other substantially equivalent credentialing bodies in addition to the Educational Commission of Foreign Veterinary Graduates of the AVMA.
- Replace the name of the licensure examination with the current name and include recognition of any other substantially equivalent examination as approved by the board.

**18 VAC 150-20-120. Requirements for licensure by endorsement as a veterinarian.**

- Provide for amendments similar to those in section 110 for recognition of credentialing bodies and examinations that are substantially equivalent to those specifically recognized in regulation.

**18 VAC 150-20-130. Requirements for practical training in a preceptorship.**

- Amend the provisions of preceptorship to clarify confusion about when a student may serve in a preceptorship. The preceptorship is intended to serve as a practicum based on the classroom knowledge gained during the educational program and as such, should

occur during the last year of training or after an equivalent number of hours have been completed.

**18 VAC 150-20-140. Unprofessional conduct.**

- Add a provision to specify that failure to provide a copy of a valid prescription to a client may constitute unprofessional conduct.

**New Part IV. Standards of Practice.**

**18 VAC 150-20-171. Specialty practice in a limited setting.**

- Exceptions to the requirement to practice veterinary medicine in a registered establishment are set forth in current regulation in 18 VAC 150-20-205 and in the Code in § 54.1-3804.1. Those provisions have been restated and placed in a new section on Standards of Practice.

**18 VAC 150-20-172. Delegation of duties to unlicensed veterinary personnel.**

- Add a section to address the issue of delegation of certain duties to unlicensed persons by listing of delegable duties but stating that the list may not be all-inclusive. The duties that may be delegated include the administration under direction and supervision of schedule VI drugs provided the veterinarian takes responsibility for the training of the assistant. This new section also specifies that a veterinarian may delegate duties electronically rather than in person provided he has examined the animal within the previous 36 hours.

**18 VAC 150-20-180. Requirements to be registered as an animal facility.**

- Clarify that the veterinary establishment is the entity that must be registered.
- Amend subsection on the veterinarian-in-charge to specify his responsibilities including that he must regularly (at least monthly) be on-site at the veterinary establishment for which he is named VIC and must provide oversight to the practice. Add the responsibility for notifying the board immediately if no longer serving as VIC.
- Amend the subsection to clearly state that the VIC remains responsible for the establishment until a new VIC is named or for 5 days, whichever occurs sooner.
- Amend the requirement to allow the application for a change in the VIC to be made 5 days prior to the change (current requirement is 10 days) and to specify that if prior notice was not given, a new permit application must be filed with the Board as soon as possible but no more than 10 days after the change.

**18 VAC 150-20-185. Renewal of animal facility permits.**

- Revise the renewal schedule for permits to a calendar year renewal rather than March 1 of each year.

**18 VAC 150-20-190. Requirements for drug storage, dispensing, destruction, and records for all facilities, full service and restricted.**

- Amend the requirement for a biennial inventory on a set date to date that is within two years of the previous inventory; the change complies with current rules of the Drug Enforcement Administration.

**18 VAC 150-20-195. Recordkeeping.**

- Amend to permit record-keeping on a group of animals in the same litter up to the age of 4 months.
- Add a provision to require notification of clients upon the sale or closure of a veterinary practice for the transfer of patient records in accordance with § 54.1-2405 of the Code.

**18 VAC 150-20-200. Standards for facilities.**

- Amend to specify that there must be a door to the surgery room rather than just a partition or opening in a small animal practice (such a requirement is not practical in large animal practices).
- Delete certain requirement that may not be essential for every practice - that includes a gas anesthesia machine, an otoscope and an ophthalmoscope.
- Amend to specify that a small animal practice may be conducted in an ambulatory establishment as well as a stationary establishment.

**18 VAC 150-20-210. Revocation or suspension of registration certificate.**

- Clarify that the grounds for disciplinary action may include any violation of statute or regulation related to the practice of veterinary medicine.
- Specify disciplinary actions other than revocation or suspension that may be taken, such as a fine, probation or reprimand.

## Alternatives

*Please describe the specific alternatives to the proposal considered and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the action.*

The major issues facing the Board in the regulation of veterinarians and veterinary technicians and the alternatives to dealing with those issues are discussed below:

### **1. Alternatives for addressing delegation of duties to unlicensed assistants**

Members of the profession are often faced with issues related to the appropriate use of unlicensed assistants in practice. The Code of Virginia (§ 54.1-3807) establishes grounds for disciplinary action if a licensee or applicant permits a person who does not hold a license to practice veterinary medicine or to perform work that can lawfully be done only by a licensed

veterinarian or veterinarian technician. Though the Code does define the practice of veterinary medicine (§ 54.1-3800), it is not specific about the duties that may be performed by unlicensed persons. Licensees often have a dilemma about what tasks constitute practice and what tasks may be appropriately delegated.

To address the problem, the Board has interpreted its law and regulation and provided guidance to licensees through its newsletter and board statements adopted in public meetings. The following guidance documents on duties that may be delegated to unlicensed assistants have been listed in the Register of Regulations and are available to anyone who requests a copy:

150-2, Newsletter of June 1997, Acceptable duties for unlicensed assistants

150-3, Board minutes of February 10, 1993, Delegation of dental procedures; inoculations of animals outside approved facilities

150-8, Board minutes of October 8, 1996, Acceptable duties for unlicensed assistants

150-9, Board minutes of May 28, 1997, Acceptable duties for equine dentists; acceptable duties for unlicensed assistants

150-10, Listing of acceptable duties for unlicensed assistants, updated November 1997

150-13, Newsletter of June 29, 1999, Special edition, Acceptable for unlicensed person to draw blood in veterinary facility

While guidance documents are helpful in disseminating information, they are not enforceable as regulation. In addition, questions have continued to be raised about whether unlicensed assistants could administer injections. Though there continue to be different legal opinions about whether language in the Drug Control Act permits unlicensed persons to possess and administer controlled substances, the Board at its February 2001 meeting offered an interpretation as follows:

*The Board of Veterinary Medicine, having heard extensive arguments on the issue over the years, interprets, as of December 5, 2000, that a properly licensed veterinarian may cause drugs, excluding Schedule II through V, to be administered (including via injection) by a properly trained assistant under the veterinarian's direction and supervision. This Board further believes it is the specific duty, and responsibility, of the prescribing veterinarian to determine that the assistant delegated to has adequate training to administer the drug in the manner prescribed.*

Rabies inoculations, as specifically provided in § 3.1-796.97:1, are excluded from the above interpretation.

While this current interpretation of whether drugs can be administered by unlicensed persons has temporarily resolved some of the uncertainty about which duties that may be delegated, the Board determined that establishing rules for delegation was less arbitrary and more enforceable than guidance provided to an inquiring veterinarian or veterinary technician. Therefore, new regulations in Part IV – Standards of Practice specify that an unlicensed assistant may administer schedule VI drugs, including by injection, provided the assistant has been adequately trained to do so safely. Using guidance documents and board opinions rendered in the past, the Board developed a listing of additional tasks that may be delegated, but stated that the list is not inclusive. By adding that qualifier, the Board has allowed for further interpretation of law and regulation by future boards on the delegation of certain tasks to unlicensed assistants. Finally, the Board considered the appropriate rule for allowing the delegation of duties to occur

electronically. Often the veterinary assistant has responsibility for animals that are housed overnight or beyond office hours, so the requirement that the veterinarian provide direct, on-site supervision was too restrictive. To permit electronic delegation (typically over the weekend by phone), the Board adopted a requirement that the animal must be seen by the veterinarian within the previous 36 hours.

## **2. Alternatives for addressing shortage of veterinary technicians**

The real or perceived shortage of technicians has fueled the drive to increase the responsibilities of unlicensed assistants. Another alternative is to increase the number of licensed vet techs, but there are a number of factors that impact that effort. Low pay and inaccessibility of educational courses are factors often cited in a discussion of the shortage of technicians. From a regulatory perspective, the Board is not able to address most of those issues, but it did consider alternative methods for licensure. Years of practice as a veterinary assistant, along with a recommendation from a veterinarian who can attest to your skills, were alternatives to the educational requirement for licensure. Other suggested alternatives included on-the-job training with in-house certification, increased distance learning opportunities, and “grandfathering” those with experience without testing.

As unlicensed assistants are being assigned additional tasks within the veterinary practice, the practice of the licensed veterinary technician is becoming more complex and responsible. For example, a modification to the definition of surgery will permit technicians to perform dental extractions and closures. In the interest of having technicians who are consistently and adequately educated and trained to assume the increasing responsibilities of that profession, the Board determined that a formal educational program followed by testing were necessary to assure the public of safety in the veterinary care of animals. The Board will continue to encourage the expansion of technician programs and any other approach that would foster the number of persons entering the profession.

## **3. Alternatives for addressing other issues**

- Issues such as the renewal schedule and the content of continuing education requirements were addressed in amendments to regulation, but a change that would allow hours to be carried over or accumulated over several years was not adopted because that would necessitate introduction of legislation to change the statute which presently requires a certain number of CE hours annually.
- Requests to permit veterinarians to fill prescriptions written by other veterinarians was addressed but not incorporated because it would also require a change to the Drug Control Act in the Code of Virginia.
- Currently, the term “animal facility” is confusing to some in the public who believe it implies that kennels and other entities may be required to register with the board; a clarification will utilize the term “veterinary establishment” which is more precise and also consistent with the authority in the Code for the Board to regulate “establishments”. Likewise, rules on record-keeping were amended to be appropriate to practices that are not small animal hospitals and to accommodate the care of litters collectively.

- Other issues, such as what acts constitute the performance of surgery, when may someone serve in a preceptorship, what are the necessary requirements for the surgery suite and what other, if any, accrediting bodies should be recognized were addressed and clarified by amending regulations.

### Public Comment

*Please summarize all public comment received during the NOIRA comment period and provide the agency response.*

An announcement of the board's intent to amend its regulations was posted on the Virginia Regulatory Townhall, sent to the Registrar of Regulations, and sent to persons on the PPG mailing list for the board. Public comment was received until December 5, 2001. During the 30-day comment period, no comments were received from members of the public.

During the review of regulations, the Board conducted hearings in several locations and solicited an extensive amount of public comment. Hearings were conducted as follows: October 25, 2000 at the Department of Health Professions in Richmond; November 8, 2000 at VA-MD Regional College of Veterinary Medicine in Blacksburg; November 16, 2000 at Thomas Nelson Community College in Hampton; and November 29, 2000 at Northern Virginia Community College in Sterling. Oral or written comments were received from approximately 84 persons with many more in attendance to support a particular perspective. The majority of the comment was centered on issues related to allowing unlicensed persons (veterinary assistants) to perform expanded, invasive tasks.

### Clarity of the Regulation

*Please provide a statement indicating that the agency, through examination of the regulation and relevant public comments, has determined that the regulation is clearly written and easily understandable by the individuals and entities affected.*

Members of the Board met in open session to work on draft regulations, and the public has been invited to comment during the course of those meetings. No comments have been received regarding the need for clarity in the proposed amendments. The Assistant Attorney General who provides counsel to the Board has been involved during the development and adoption of proposed regulations to ensure clarity and compliance with law and regulation.

### Periodic Review

*Please supply a schedule setting forth when the agency will initiate a review and re-evaluation to determine if the regulation should be continued, amended, or terminated. The specific and measurable regulatory goals should be outlined with this schedule. The review shall take place no later than three years after the proposed regulation is expected to be effective.*

Public participation guidelines require the Board to review regulations each biennium or as required by Executive Order. Regulations governing the practice of veterinary medicine will be reviewed again during the 2004-05 fiscal year.

### Family Impact Statement

*Please provide an analysis of the proposed regulatory action that assesses the potential impact on the institution of the family and family stability including the extent to which the regulatory action will: 1) strengthen or erode the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and one's children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.*

In its preliminary analysis of the proposed regulatory action, the agency has determined that there is no potential impact on the institution of the family and family stability and no effect on family income.